U.S. Army Materiel Command

Lisa Simon

IT Accessibility for the Disabled

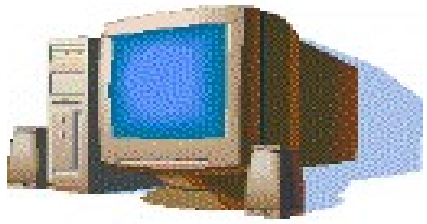
AMC-Army Readiness Command - Serving Every Soldier Every Day

What's The Problem?

- **Many Disabled Employees Have Difficulty Using Computers**
- **Some Reasons . . .**
  - **Windows-Based Software Often Requires Mouse**
  - **Internet Requires Mouse**
  - **Internet Often Uses Sound**
  - **Internet Often Uses Pictures or Picture-Based Documents**
  - **Touch Screens Rely on Color**
  - **Monitors Flicker At A Rate That Is Difficult for Some People to See**
  - **Computer Hardware Is Not Compatible with Adaptive Technology**
    - **E.g., Screen Readers, Refreshable Braille Dis**

“Section 508”

- **Congress Recently Amended the Rehabilitation Act**
  - **29 USC 794d**
- **By Law, All Federal Electronic and Information Technology Must Be Comparably Accessible to Disabled and Able-Bodied Employees**
  - **Broadly Applies to Any Time We “<u>Develop, Procure, Maintain, or Use</u>” EIT**
  - **Unless <u>Undue Burden</u>**
- **Creates Right To Sue Agencies for Non-Compliance**
  - **Injunctive Relief and Attorneys’ Fees**
- **Creates Reporting Requirement**



Key Definitions

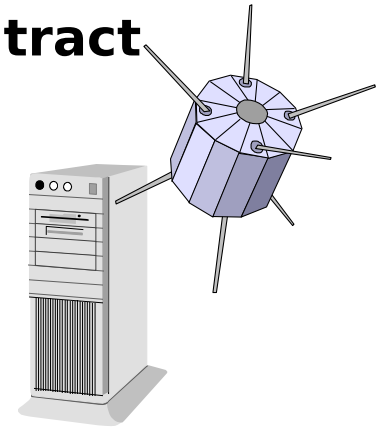
- **Information Technology**
  - Any Equipment or Interconnected System or Subsystem of Equipment , that Is Used in the Automatic Acquisition, Storage, Manipulation, Management, Movement, Control, Display, Switching, Interchange, Reception, or Transmission of Data or Information.
  - Includes Computers, Ancillary Equipment, Software
- **Electronic Information Technology**
  - Includes Information Technology and Any Equipment or Interconnected System or Subsystem of Equipment that Is Used in the Creation, Conversion, or Duplication of Data.
  - E.g., Telephones, Internet and Intranet Sites, Multi-Media Equipment, Office Equipment
  - Does Not Include Embedded Technology In Other Equipment -- e.g., HVAC, Medical Equipment
- **Undue Burden**
  - Significant Difficulty or Expense
  - Must Document Finding of Undue Burden
  - Must Still Make Information Accessible

Regulatory Implementation

- **“Access Board” Standards**
  - **Fed. Reg., Vol. 65, No. 246, pp. 80500-80528 (Dec. 21, 2000)**
  - **36 CFR 1194**
  - **Effective in Six Months -- 6/21/01**
- **FAR Case 1999-607**
  - **Fed. Reg., Vol. 66, No. 14, pp. 7165-7168 (Jan. 22, 2001)**
  - **Comments Due By 3/23/01**
- **Key Points of FAR Case**
  - **Will Require Acquisition Planners to Incorporate EIT Standards in Plans, Specs, SOWs, and Product Descriptions**
  - **Will Require All EIT To Meet Access Board Standards**
  - **Will Require Commercial Items To Meet Commercial Accessibility Standards In Time For Delivery Schedule**

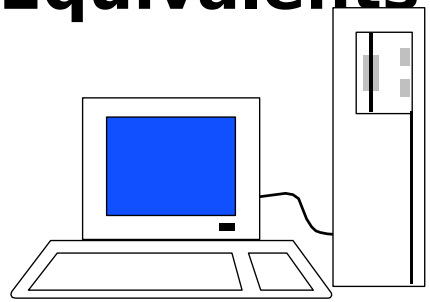
Exceptions

- **Micro-Purchases Until 1/23/03**
- **National Security Items**
  - **Command and Control of Military Forces**
  - **Information Which Is an Integral Part of a Weapon or Weapons System**
  - **Systems which are Critical to the Direct Fulfillment of Military Missions**
    - **Exception Does Not Apply To Routine Administrative and Business Applications (e.g., payroll, logistics, finance, and personnel management)**
- **Acquired by a Contractor Incidental to a Contract**
- **“Back Room” Equipment**
- **Where Undue Burden**



Example of Standards

- **<u>Software</u>: Must Be Able to Execute Functions from the Keyboard**
- **<u>Hardware</u>: Must Be Compatible With Assistive Technology**
- **<u>Telecommunications Equipment</u>: Must Be Able To Use Voicemail with TTY**
- **<u>Multi-Media Products</u>: Must "Close-Caption" All Training and Informational Videos**
- **<u>Internet Sites</u>: Must Include Text Equivalents For Non-Text Elements**



For More Information

- **http://www.section508.gov**
- **http://www.access-board.gov**
- **FREE TRAINING!**
  - **3/9/01: Boston, MA**
  - **3/26/01: Washington DC**
  - **4/5/01: San Francisco, CA**
  - **4/26/01: Dallas, TX**
  - **5/10/01: Kansas City, MO**
  - **For More Info, See: http://www.cmpinc.net/section508**